



**SACRAMENTO AREA  
BICYCLE ADVOCATES**

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Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814  
[CEQA.Guidelines@ceres.ca.gov](mailto:CEQA.Guidelines@ceres.ca.gov)

Subject: Preliminary Discussion Draft of Updates to CEQA Guidelines Implementing Senate Bill 743

Dear Mr. Calfee:

Thank you for the opportunity to comment on the Preliminary Draft Updates to CEQA Guidelines Implementing SB 743. We are very pleased to see this progressive shift of the focus of transportation analysis to reducing greenhouse gas emissions, creating multimodal networks, and promoting mixed land uses.

We strongly support several specific aspects of the draft updates, including:

1. Measuring transportation impacts in CEQA analysis primarily by the increases in vehicle trips and distances traveled caused by a project. The formerly mandated analysis of vehicle level of service as the measure of transportation impacts clearly resulted in projects decreasing bicycling safety and discouraging bicycle use.
2. Identifying impacts to the safety of active roadway users as an explicit type of environmental impact that must be analyzed in CEQA documents. For example, a project that produces large increases in the speed and volume of traffic on a city's downtown streets would cause a significant adverse impact on pedestrians and bicyclists that must be mitigated by infrastructure changes or management measures to minimize the impact. Without such mitigation, people would be discouraged from active transportation modes in such a situation.
3. Listing examples of ways that projects may reduce multi-modal transportation safety in subdivision (b)(3). Nearly all the examples provided will increase the hazards of bicycle use in the vicinity of a project. We would add increase in vehicle volume along with vehicle speeds to example (D).
4. Listing many bicycling related actions among the "potential measures to reduce vehicle miles traveled" in Appendix F.
5. Making much more straight-forward the language in the questions about project impacts on transportation in Appendix G.

SABA works to ensure that bicycling is safe, convenient, and desirable for everyday transportation. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient, and least congesting form of transportation.

Thank you for considering our comments.

Sincerely,

Jordan Lang  
Project Analyst